

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE ALLERGAN GENERIC DRUG PRICING
SECURITIES LITIGATION

Case No. 2:16-cv-09449 (KSH) (CLW)

**NOTICE OF LEAD PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT AND AUTHORIZATION
TO DISSEMINATE NOTICE OF SETTLEMENT**

To: All Counsel by ECF

COUNSEL:

PLEASE TAKE NOTICE that at such date and time as the Court determines Lead Plaintiffs Sjunde AP-Fonden and Union Asset Management Holding AG (collectively, "Lead Plaintiffs"), by counsel, will move under Rule 23 of the Federal Rules of Civil Procedure for entry of the proposed Preliminary Approval Order that, among other things, will (i) preliminarily approve the proposed Settlement of this Action; (ii) approve the form and manner of giving notice of the proposed Settlement to Class Members; and (iii) schedule a hearing to consider final approval of the Settlement and approval of the Plan of Allocation and Lead Counsel's motion for an award of attorneys' fees and expenses.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, the undersigned intend to rely on the accompanying Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that the parties' Stipulation and Agreement of Settlement dated July 8, 2021 and its exhibits (collectively, "Stipulation") and the parties' agreed-upon proposed form of Preliminary Approval Order and its exhibits are attached.

PLEASE TAKE FURTHER NOTICE that, in accordance with the terms of the Stipulation, Defendants will not oppose this Motion so Lead Plaintiffs respectfully submit that the Motion is ripe for consideration by the Court.

Dated: July 9, 2021

Respectfully submitted,

/s/ James E. Cecchi

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